



FILED VIA ECFS

March 1, 2021

Marlene H. Dortch Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20510

Jeffrey Marks
Vice President
Regulatory Affairs

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1200 G Street, NW
Suite 800
Washington, DC 20005

Email:
jeffrey.marks@nokia.com

Re: *Notice of Ex Parte Presentation, Proposal to Permit Lower Gain Antennas in the 70/80 GHz Band*

WT Docket No 20-133, Modernizing and Expanding Access to the 70/80/90 GHz Bands
WT Docket No. 10-153, Amendment of Part 101 to Facilitate Wireless Backhaul

Dear Ms. Dortch:

On February 25, 2021, representatives from Aviat, Comsearch, Ericsson and Nokia ("5G Wireless Backhaul Advocates" or "Advocates") met with staff of the Wireless Telecommunications Bureau. The meeting attendees are listed in Attachment A.

The Advocates thanked the Commission for seeking comment and refreshing the record on the longstanding industry proposal to allow use of smaller, lighter antennas for 5G wireless backhaul in the 70/80 GHz band through modest rule changes, including reducing the minimum antenna gain from 43 dBi to 38 dBi.¹ The Advocates confirmed that we see high demand in the U.S. for such smaller/lighter antennas, which have been available in Europe and other

¹ An earlier-filed ex parte presentation setting forth key rule changes was shared in the meeting. *See* Letter from Jeffrey A. Marks, Head of Regulatory Affairs North America, Nokia, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 10-153 et al. (filed Mar. 17, 2020) ("5G Wireless Backhaul Advocates Ex Parte").

geographies for nearly a decade.² Requests for rule changes to allow for such smaller, lighter antennas have been pending before the Commission since 2012.³ As discussed in the meeting, these proposed changes to the Fixed Service rules are completely independent of various “endpoints in motion” proposals that appear to have delayed Commission action in this proceeding. The Advocates respectfully request the Commission recognize the important role that this band can play in the success of 5G deployments and consider our proposal on an expedited, separate track from consideration of proposals to implement endpoints in motion. We believe that the public interest would be served by decoupling these two separate topics.

In response to questions from Commission staff, the 5G Wireless Backhaul Advocates confirmed that smaller antennas with lower minimum gain will not be more sensitive to potential interference caused by emissions from endpoints in motion compared to fixed service antennas currently on the market, nor will a rule change allowing lower minimum gain result in more interference into proposed endpoints in motion services. While we reserve the right to separately comment on the merits of the various endpoints in motion proposals, those merits are independent of the Fixed Service rule changes we request. There is consensus in the record that our proposal to improve Fixed Services in what is a thriving Fixed Service band would serve the public interest and facilitate 5G in the U.S. It is therefore frustrating that the Commission’s comparatively complex task of deciding whether to authorize endpoints in motion – a completely new service in the band, and with multiple competing views even among proponents – may be holding up our longstanding request.

The 5G Wireless Backhaul Advocates therefore request that the Commission adopt our targeted proposed rule changes without delay so carriers can integrate smaller, lighter wireless backhaul antennas into their 5G network designs as soon as possible. To the extent the Commission determines more time is required for consideration of endpoints in motion proposals, we ask that such consideration continue independently and that the Commission approve modernization of its wireless backhaul rules on an expedited basis.

Please contact the undersigned with any questions in connection with this submission.

Respectfully submitted,

/s/ Jeffrey A. Marks

Jeffrey A. Marks
Vice President Regulatory Affairs
North America

cc: Commission attendees (listed on Attachment A)

² ETSI Class 3 is formally referred to as European Telecommunications Standards Institute standard ETSI EN 302 217-4-2 (V1.5.1). See https://www.etsi.org/deliver-etsi_en/302200_302299/30221-70402/01.05.01_40-en_3022170402v010501o.pdf.

³ See, e.g., Comments of the Fixed Wireless Communications Coalition, WT Docket No. 10-53, et al. (filed Oct. 5, 2012); Request for Waiver, Aviat Networks, Inc., WT Docket No. 15-244 (filed Apr. 5, 2013).

Attachment A

Commission Attendees

- Stephen Buenzow
- Peter Daronco
- John Lambert
- Anthony Patrone
- Arielle Roth
- Blaise Scinto
- Jeff Tignor

Industry Attendees

- Ruth French, Aviat
- Peter Young, Comsearch
- Joseph Marzin, Comsearch
- Mark Racek, Ericsson
- Jeffrey Marks, Nokia